

Fourth Circuit

[United States v. Bell](#), No. 16-4403, 2017 WL 5899926 (4th Cir. Nov. 29, 2017) (unpublished) (COV)

The Fourth Circuit affirmed the district court's sentence, concluding that petitioner's conviction in violation of North Carolina's second-degree murder statute qualifies as a **crime of violence** under the force clause of U.S.S.G. § 4B1.2(a) (same as 18 U.S.C. § 16(a)).

Ninth Circuit

[Raymundo v. Sessions](#), No. 12-74247, 2017 WL 5897161 (9th Cir. Nov. 30, 2017) (unpublished) (Asylum-PSG)

The Ninth Circuit granted the PFR and remanded to the Board to analyze the **particular social group** issue in the first instance in light of *Arteaga v. Mukasey*, 511 F.3d 940 (9th Cir. 2007), and *Henriquez-Rivas v. Holder*, 707 F.3d 1081 (9th Cir. 2013) (en banc).